



2014 OCT 23 PM 3:02
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OFFICE OF GENERAL
COUNSEL

Oklahoma Democratic Party
Chairman Wallace Collins
4100 N Lincoln BLVD
Oklahoma City, OK 73105

Friday, October 24, 2014

Federal Election Commission
Office of General Counsel
999 E Street, NW
Washington, DC 20463

To whom it may concern:

MUR 6894

The Oklahoma Democratic Party has uncovered reasons to believe that Steve Russell, the Republican nominee for Oklahoma's Fifth Congressional seat, his committee Steve Russell For Congress and committee treasurer, David Lee Tinker have failed to disclose disbursements or debt on the Pre-General report filed by the respondents on October 23, 2014. We feel confident in alleging this violation based on the following facts:

1. We have obtained the publically available purchase contract of television advertising between KOCO, a television station in Oklahoma City, and Thompson Communications Inc., a firm in Marshfield, MO doing business on behalf of the respondents. The attached document is a copy of the media buy which shows that Thompson Communications purchased at least \$20,000 in television advertising on October 14, 2014 on behalf of the respondents.
2. On October 23, 2014 the respondents filed a pre-general report (FEC-968179). This report covered the period of October 1, 2014 through October 15, 2014. The filing does not include the television advertising purchase or any business with Thompson Communications Inc. as either a disbursement or debt.

The television advertising purchase should have been disclosed on the pre-general report because documents show that the purchase happened on October 14, 2014 which is within the reporting period. The Russell campaign's failure to disclose these advertising payments constitute a gross violation of the Federal Election Campaign Act's disclosure requirements that give individuals notice as to how much candidates spend on those activities that affect the election. By failing to disclose these payments, the campaign has denied the voters the right to know how much he spent on television advertising during this crucial campaign period. Any disclosure that is made, if at all, will now not be known prior to Election Day.

If you should have any question or concern with our complaint, please feel free to contact our office at any time. Our staff can be reached during business hours at (405) 427-3366.

Thank you,

Wallace Collins
Wallace Collins
Chairman



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State of Oklahoma
County of Oklahoma

Signed or attested before me on October 24, 2014 by Wallace Collins.



(Seal, if any).

Donna L. Russell
Signature of notarial officer

My commission expires: 10/15/18
My commission #: 10008632